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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

21 JUN 2005

Ms. Peggy Casey
Environmental Projects Engineer
Federal Highway Administration
209 Adams Street
Jefferson City, MO 65101-3203

Dear Ms. Casey:

Re: Review of Draft Environmental Impact Statement for Route 34 Corridor,
Carter, Reynolds, Wayne, Bollinger, and Cape Girardeau Counties,
Missouri, MoDOT Job No. J9P0456Z

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Route 34 Corridor Study. Our review is provided pursuant to the National Environmental Policy Act (NEPA) 42 U.S.C. 4231, Council on Environmental Quality (CEQ) regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act (CAA). The DEIS was assigned the Council on Environmental Quality (CEQ) number 20050181.

Based on our overall review and the level of our comments, the EPA has rated the Draft Environmental Impact Statement for this project EC- 2 (Environmental Concerns- Insufficient Information). A copy of EPA's rating descriptions is provided as an enclosure to this letter.

This EC- 2 rating is based on the uncertainty of potential impacts that could arise between now and the projected construction start date of at least 10 years. It is important to be aware of that fact that the useful 'life' of an EIS is considered to be 5 years; after that time period, additional analysis and documentation may be required. For more information, see the Council of Environmental Quality's (CEQ) website <http://ceq.eh.doe.gov/nepa/nepanet.htm> and the "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations" (<http://ceq.eh.doe.gov/nepa/regs/40/30-40.HTM#32>).

In addition, we recommend that a broad ecosystem approach be used for mitigation of the stream impacts. Page 3-47 states that the total length of jurisdictional stream impact is 2.2 miles which includes relocating jurisdictional streams channels for a length of approximately 2,687 feet. The project will also relocate 1,078 feet of non-jurisdictional streams (page 3-49). Due to this significant impact, within and out of channel options for improving stream systems should be considered. These options can